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13 December 2004
File No. 28882-604

California Regional Water Quality Control Board - Los Angeles Region
320 W. 4th Street, Suite 200
Los Angeles, California 90013

Attention: Mr. John Geroch

Subject: Former Boeing C-6 Facility
Los Angeles, California
Shallow Soil Impacts Discovery Response Plan

Dear Mr. Geroch:

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Shallow soil (0 to 12 feet below ground surface) at Parcel C of the Boeing Realty Corporation (BRC) former C-6 Facility (Site) located in Los Angeles, California, has been investigated and remediated to levels that have been approved by the Regional Water Quality Control Board - Los Angeles Region (LARWQCB). The LARWQCB's approval of this work, and a "No Further Action" determination for commercial/industrial land use on Parcel C were issued on 6 December 2002.

Redevelopment activities of the final lot of Parcel C (Lot 8) at the Site are currently scheduled to commence in late December 2004. These redevelopment activities will include Site grading and excavation of shallow soils for new building utilities and foundations. Although additional shallow soil impacts are not expected to be encountered, any suspected impacted soil, if observed during redevelopment activities, would generally be addressed as follows:

- An appropriate number of soil samples will be collected and analyzed in the laboratory to characterize the material. Soil sampling and analysis will be performed in accordance with Site-specific LARWQCB-approved work plans. If the impacted soil is located in a time-critical area, soils may be excavated based on visual staining and/or field screening without performing initial laboratory analyses. Confirmation samples will then be collected from the excavation.
- If constituent concentrations in confirmation soil samples exceed the LARWQCB-approved cleanup criteria, the LARWQCB will be promptly notified.
- The impacted soils will be excavated in accordance with LARWQCB-approved protocols.
- Confirmation samples will be collected from the excavation to verify that the impacts have been removed to LARWQCB-approved levels to maintain the "No Further Action" status.

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- Once the confirmation soil samples meet the LARWQCB-approved levels, the excavation will be backfilled and compacted in accordance with Site-specific grading and compaction requirements.
- Excavated soil will be stockpiled or placed in bins and managed in accordance with LARWQCB-approved protocols.
- Boeing will submit an addendum shallow soil remediation report to the LARWQCB verifying that the impacted material has been removed.

Approval of this approach to addressing any impacted soil encountered during redevelopment activities is respectfully requested. If you have any questions, please feel free to contact either Mr. Robert Scott at 562.733.2229 or me at 619.993.1791.

Sincerely yours,
HALEY & ALDRICH, INC.



Scott P. Zachary
Project Manager

c: Boeing Realty Corporation - R. Scott
File-28882

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